

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE WESTERN DISTRICT OF PENNSYLVANIA (PITTSBURGH)**

IN RE:	
MATTIE M DAVID	Case No. 18-22880/GLT
Debtor	
FREEDOM MORTGAGE CORPORATION	Chapter 13
Movant	Hearing Date: TBD
v.	Hearing Time: TBD
MATTIE M DAVID	Objection Date: TBD
Respondent	11 U.S.C. §362

**STIPULATION IN SETTLEMENT
OF MOTION FOR NUNC PRO TUNC RELIEF FROM THE STAY
IN ORDER TO PROCEED WITH MORTGAGE FORBEARANCE**

1. Movant is Freedom Mortgage Corporation, a secured creditor holding a mortgage on the property located at 54 Areford Blvd., Uniontown, Pa 15401. Movant filed a proof of claim on September 27, 2018, Claim No. 15.
2. Respondent is Mattie M. David, who filed a Chapter 13 on July 20, 2018.
3. Respondent applied for and Movant approved a forbearance of Respondent's ongoing regular monthly mortgage payments pursuant to the CARES Act. The approved forbearance period was March 2020 through December 2020.
4. Movant filed a Motion for Nunc Pro Tunc Relief From The Stay In Order To Proceed With Mortgage Forbearance on January 22, 2021, Doc. No. 63 ("Motion").
5. Respondent filed a Response to the Motion on January 26, 2021, Doc. No. 70.
6. A hearing on the Motion was held on March 10, 2021 and continued to May 19, 2021, and after the May 19, 2021 hearing a stipulation to resolve the matter is due on or before May 26, 2021. Doc. No. 79.

7. In the interim, the Parties confirmed that Respondent continued to make conduit payments during the forbearance period, and it was agreed by the Parties that the payments made should be applied to the forborne dates.

8. However, after application of the payments, Respondent still has a post-petition delinquency to Movant for payments due July 2020 and each month thereafter.

9. Accordingly, Respondent wishes to enter a forbearance for the payments due July 2020 through December 2020, and/or obtain loan modification to bring the account current.

10. Therefore, the Parties agrees as follow:

- a. Movant's Motion filed at Doc. No. 63 is granted;
- b. Respondent will apply for another forbearance and Movant will timely review same, specifically for the requested timeframe of July 2020 to December 2020.
- c. Respondent may also apply for a loan modification and Movant will timely review same to determine Respondent's eligibility to permanently modify the loan and bring both the pre and post-petition arrears current.

Dated: May 26, 2021

/s/ Mario Hanyon

Mario Hanyon, Esquire
Attorney for Movant

/s/ Daniel R. White

Daniel R. White, Esquire
Attorney for Respondent/Debtor